

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

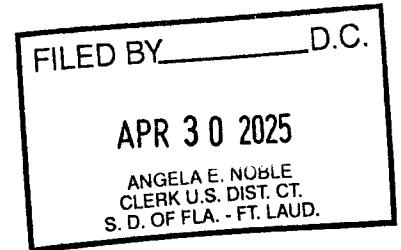
CASE NO. 25-MJ-6272-VALLE

UNITED STATES OF AMERICA

v.

MANUEL LOPEZ PEREZ,

Defendant.



CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? No
2. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
3. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
4. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

By: **Adam M. Love**
ADAM M. LOVE
Assistant United States Attorney
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AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America)

v.)

MANUEL LOPEZ PEREZ)

Case No.)

25-MJ-6272-VALLE)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 29, 2025 in the county of Broward in the
Southern District of Florida, the defendant(s) violated:

Code Section

Offense Description

Title 8 U.S.C. Section 1326(a)

Illegal Reentry After Removal

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.



Complainant's signature

Jayden Richards, CBP Border Patrol Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 04/30/2025



Judge's signature

City and state: Ft. Lauderdale, Florida

Alicia O. Valle, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jayden W. Richards, being duly sworn, attest and affirm the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am employed as a Border Patrol Agent with the United States Border Patrol (“USBP”), Customs and Border Protection (“CBP”) and have been so employed for approximately 18 years. As a Border Patrol Agent, my duties include the detection and interdiction of individuals illegally entering the United States and those aliens who are currently within the United States illegally. My current responsibilities include the investigation of criminal and administrative violations related to the Immigration and Nationality Act and other federal criminal offenses.

2. This Affidavit is submitted in support of a criminal complaint that charges Manuel Lopez Perez (“LOPEZ PEREZ”) with Illegal Reentry of a Removed Alien, in violation of Title 8, United States Code, Section 1326(a).

3. The information set forth in this Affidavit comes from my personal involvement in this investigation, as well as from information provided to me by other law enforcement officers and people with knowledge of the case. This Affidavit does not represent every fact law enforcement knows about this investigation but is submitted for the limited purpose of establishing probable cause for the criminal complaint against HERNANDEZ PEREZ.

PROBABLE CAUSE

4. On April 29, 2025, at approximately 6:50 a.m., the Florida Highway Patrol (FHP) stopped a vehicle with Florida license plate N310ZT at the westbound offramp of I-575 and University Drive in Davie, Florida because the taillight failed to illuminate while traveling. During the stop, FHP saw multiple individuals inside the vehicle. A nearby USBP agent assigned to the Dania Beach Border Patrol Station (PPF) assisted FHP during the stop. FHP spoke with an individual identified himself as LOPEZ PEREZ stated that he is from Mexico and provided a voter

registration card which appeared to be issued by Mexico. LOPEZ PEREZ was arrested and transported to PPF.

5. At PPF, USBP conducted a records check in U.S. Department of Homeland Security (DHS) databases for the name Manuel Lopez Perez. USBP identified immigration records associated with the name Manuel Lopez Perez and matched the photograph and date of birth contained in the records to that of LOPEZ PEREZ. USBP confirmed LOPEZ PEREZ's statement in that he is from Mexico and did not have any immigration documents that would allow him to be legally present in the United States.

6. Additional records showed that on October 23, 2018, LOPEZ PEREZ was arrested by CBP near Laredo, Texas and processed for expedited removal from the United States on or about October 23, 2018.

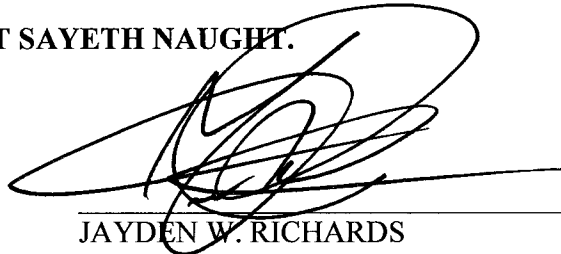
7. Records checks have confirmed that LOPEZ PEREZ has not received permission from the Attorney General or the Secretary of the Department of Homeland Security, to reenter or be present in the United States.

[Remainder Intentionally Left Blank]

CONCLUSION

8. Based on the foregoing facts, I respectfully submit that there is probable cause exists to believe that on or about April 29, 2025, in Broward County, in the Southern District of Florida, LOPEZ PEREZ committed a violation of Title 8, United States Code, Section 1326(a), that is, illegal reentry by an alien who has been previously removed from the United States without having received the permission from the Attorney General of the United States or the Secretary for the Department of Homeland Security.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

A handwritten signature in black ink, appearing to read 'Jayden W. Richards', written over a horizontal line.

JAYDEN W. RICHARDS
Border Patrol Agent
United States Border Patrol
U.S. Customs and Border Protection

Sworn to before me and signed in my presence
this 30th day of April 2025.

A handwritten signature in black ink, appearing to read 'Alicia O. Valle', written over a horizontal line.

ALICIA O. VALLE
UNITED STATES MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NUMBER: 25-MJ-6272-Valle

BOND RECOMMENDATION

DEFENDANT: Manuel Lopez Perez

PTD

(Personal Surety) (Corporate Surety) (Cash) (Pre-Trial Detention)

By: Adam Love
AUSA: Adam Love

Last Known Address: Refused to provide

What Facility: _____

Agent(s): Jayden Richards
(FBI) (SECRET SERVICE) (DEA) (IRS) (ICE) (**OTHER**)
U.S. Customs and Border Protection